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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91223456
Party	Plaintiff Brouwerij Nacional Balashi NV
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Submission	Request to Withdraw as Attorney
Filer's Name	Susan J. Latham
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Signature	/s/ Susan J. Latham
Date	09/09/2016
Attachments	Motion to Withdraw as Counsel.pdf(128856 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Brouwerij Nacional Balashi N.V.

Opposer,

v.

t & beer, inc.,

Applicant.

Opposition No. 91223456

Mark: BALASHI SPIRITS

Serial No.: 86/566,095

**MOTION TO WITHDRAW AS COUNSEL FOR THE OPPOSER**

Cozen O'Connor along with its attorneys, which currently represent Opposer Brouwerij Nacional Balashi N.V. in this Proceeding, respectfully requests to withdraw as counsel for the Opposer pursuant to 37 CFR § 2.19 and § 11.116 and Rule 116 of the Trademark Trial and Appeal Board Manual of Procedure. In support this request, counsel states as follows:

1. Cozen O'Connor has given notice to the Opposer: (a) of its intent to move to withdraw as its counsel in this proceeding; (b) that it would be filing this Motion; (c) of the current status of this Proceeding and all deadlines currently set in this Proceeding; and (d) of Opposer's obligation to prepare for all proceedings that will occur throughout the remainder of the Opposition Proceeding, including trial.

2. Cozen O'Connor is moving to withdraw as counsel for the Opposer in this Proceeding because its representation has been terminated by the Opposer. Accordingly, Cozen O'Connor must withdraw pursuant to 37 C.F.R. 11.116(a)(3).

3. Cozen O'Connor has given notice to the Opposer that it will deliver to the Opposer all documents and property in Cozen O'Connor's possession concerning this Proceeding to which the Opposer is entitled.

4. This request is presented in good faith and is not motivated by any unreasonable delay, or by any desire to create any unreasonable delay.

5. Although there are no co-counsel representing Opposer in this Proceeding, the relief sought herein will not prejudice any party. A brief suspension of the deadlines in this matter to allow Opposer to arrange for new counsel would not cause actual prejudice in this Proceeding.

**WHEREFORE**, Opposer respectfully requests that the Board issue an order granting Cozen O'Connor's (*including, but not limited to, its attorneys Jeffrey Feldman, Susan Latham, and Ashley Kessler*) request to withdraw as counsel for the Opposer.

Dated: September 9, 2016

Respectfully Submitted,  
COZEN O'CONNOR  
*Attorneys for Opposer*

By: /s/ Susan J. Latham  
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**CERTIFICATE OF ELECTRONIC FILING**  
**AND CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing document entitled: **MOTION TO WITHDRAW AS COUNSEL FOR THE OPPOSER** is being submitted electronically via the Electronic Filing System for Trademark Trial and Appeals on this 9<sup>th</sup> day of September, 2016.

I hereby certify that, pursuant to the parties' agreement to serve documents in this proceeding electronically, a true and complete copy of the foregoing document entitled: **MOTION TO WITHDRAW AS COUNSEL FOR THE OPPOSER** has been served upon the Applicant on this 9<sup>th</sup> day of September 2016, by transmitting a copy of same via electronic mail to:

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/Susan Latham/

Susan J. Latham  
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